

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ELLIOTT BROIDY, et al.,

Plaintiffs,

—v.—

GLOBAL RISK ADVISORS LLC, et al.,

Defendants.

Case No. 1:19CV11861 (MKV)

**DECLARATION OF MICHAEL FRANCISCO**

I, Michael Francisco, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner with the law firm McGuireWoods LLP and counsel to Plaintiffs Elliott Broidy and Broidy Capital Management, LLC (collectively, “Plaintiffs”). I respectfully submit this declaration in support of Plaintiffs’ Motion for Leave to Amend.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Proposed Second Amended Complaint.

3. Attached hereto as Exhibit 2 is a true and correct copy of the blacklined version of the Proposed Second Amended Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 1<sup>st</sup> day of June, 2021.

  
Michael Francisco